

**United States District Court
District of Massachusetts**

United States

v.

John Gillies, et. al.

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Case No. : 03-cr10234MLW

**ASSENTED-TO MOTION TO EXTEND TIME
FOR FILING MOTIONS TO SUPPRESS**

John Gillies, Benjamin Silver, and Joshua Goldsmith, the defendants in the above-entitled case, move that this Court extend the time for filing motions to suppress until January 10, 2005.

In support of this motion, the defendant states as follows.

1. Counsel for the defendants have engaged in discussion with the Government regarding a potential resolution of the case.
2. Additional time is needed to complete those discussions.
3. The government has made a plea offer that would involve the government's not filing notice pursuant to 21 U.S.C. § 851 regarding minimum mandatory sentences based on prior convictions and the defendants' forgoing their right to file motions to suppress. The defendants are currently considering this offer.
4. Counsel for the defendants and for the Government have assented to

this motion.

ASSENTED TO:

United States of America
By its attorney,

JOHN GILLIES
By his attorney,

/s/ Robert Peabody
AUSA Robert Peabody
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By his attorney,

JOSHUA GOLDSMITH
By his attorney,

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